

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GUARDIAN OPERATIONS LLC, a
Washington limited liability company,

Plaintiff-
Counterdefendant,

vs.

TRISTATE ROOFING INC., a Washington
corporation,

Defendant-
Counterclaimant.

CIVIL ACTION No. 2:24-cv-00430-JHC

**STIPULATED MOTION FOR
EXTENSION OF TIME OF ALL
DEADLINES**

**NOTE ON MOTION CALENDAR:
August 14, 2024**

Plaintiff and Counterdefendant Guardian Operations LLC, (“Guardian”) and Defendant Counterclaimant Tristate Roofing, Inc. (“Tristate”), by and through its undersigned attorneys, respectfully request that the Court extend all deadlines in this action as follows:

1. The parties have agreed in principle to a settlement and, in order to provide the parties with additional time to finalize the settlement, the parties agree that the time for all deadlines in this case should be extended by at least 30 days.

2. Good Cause exists for this extension as the parties are negotiating in good faith to finalize a settlement for this dispute and require additional time to come to an agreement. Having

1 additional time to finalize the settlement agreement will be beneficial to finalizing an amicable
2 resolution to this case without expending further judicial resources.

3 3. The parties respectfully request that the Court enter the below Order extending the
4 existing deadlines as follows:

- 5 a. **September 16, 2024:** Guardian's opposition deadline to Tristate's Motion to Strike
6 Counterclaim Defendant's Affirmative Defenses ("Motion to Strike") (Dkt. 13)
7 (previously August 16, 2024);
- 8 b. **September 20, 2024:** Noting date for Motion to Strike and deadline for Tristate's
9 reply to Guardian's opposition to Motion to Strike (previously August 21, 2024);
- 10 c. **September 23, 2024:** Tristate's opposition deadline to Guardian's Motion for
11 Judgment on the Pleadings ("Motion for Judgment on the Pleadings") (Dkt. 14)
12 (previously August 23, 2024);
- 13 d. **September 25, 2024:** Deadline for FRCP 26(f) Conference (previously August 26,
14 2024);
- 15 e. **September 30, 2024:** Noting date for Motion for Judgment on the Pleadings and
16 deadline for Guardian's reply to Tristate's opposition to Motion for Judgment on
17 the Pleadings (previously August 30, 2024);
- 18 f. **October 9, 2024:** Initial Disclosures Pursuant to FRCP 26(a)(1) (previously
19 September 9, 2024);
- 20 g. **October 16, 2024:** Combined Joint Status Report and Discovery Plan as Required
21 by FRCP 26(f) and Local Civil Rule 26(f) (previously September 16, 2024).

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1 DATED this 14th day of August, 2024

DORSEY & WHITNEY LLP

2 *s/ J. Michael Keyes*

3 J. Michael Keyes (#29215)

4 keyes.mike@dorsey.com

5 Dylan Harlow (#58422)

6 harlow.dylan@dorsey.com

7 DORSEY & WHITNEY LLP

8 Columbia Center

9 701 Fifth Avenue, Suite 6100

10 Seattle, WA 98104

11 (206) 903-8800

12 *Attorneys for Plaintiff Guardian Operations LLC*

13 BAMERT REGAN PLLC

14 *s/ John J. Bamert*

15 John J. Bamert (48128)

16 bamert@bamertregan.com

17 113 Cherry Street, Unit 55215

18 Seattle, Washington 98104

19 206.486.7022

20 *Counsel for Defendant Tristate Roofing Inc.*

ORDER

Based on the foregoing stipulation of the parties and good cause shown, IT IS HEREBY ORDERED that the deadlines in this action are extended as follows:

- September 16, 2024: Guardian's opposition deadline to Tristate's Motion to Strike Counterclaim Defendant's Affirmative Defenses ("Motion to Strike") (Dkt. 13);
- September 20, 2024: Noting date for Motion to Strike and deadline for Tristate's reply to Guardian's opposition to Motion to Strike;
- September 23, 2024: Tristate's opposition deadline to Guardian's Motion for Judgment on the Pleadings ("Motion for Judgment on the Pleadings") (Dkt. 14);
- September 25, 2024: Deadline for FRCP 26(f) Conference;
- September 30, 2024: Noting date for Motion for Judgment on the Pleadings and deadline for Guardian's reply to Tristate's opposition to Motion for Judgment on the Pleadings;
- October 9, 2024: Initial Disclosures Pursuant to FRCP 26(a)(1);
- October 16, 2024: Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f).

The Court DIRECTS the Clerk to adjust the noting dates for the two pending motions as set forth above.

DATED this 14th day of August, 2024.



John H. Chun
UNITED STATES DISTRICT JUDGE